

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MICHIGAN

DEBBIE HAYWARD,

Plaintiff,

v.

R.M. GALICIA, INC., a/k/a
PROGRESSIVE MANAGEMENT
SYSTEMS,

Defendant.

Civil Action No.: 11-cv-01265-JTN
Hon: Janet T. Neff

MOTION TO TRANSFER VENUE

COMES NOW R.M. Galicia, Inc., a/k/a Progressive Management Systems, and moves this Court pursuant to 28 U.S.C. § 1404(a) to enter an order transferring venue from the United States District Court for the Western District of Michigan to the Central District of California where this action may be more conveniently litigated and jurisdiction and venue are proper. As set forth in the accompanying memorandum of law and supporting affidavits, transfer is especially warranted here. None of the actions or events at issue transpired within this district or the State of Michigan, and all of the witnesses and potential evince are located elsewhere. Even plaintiff resides in another state.

The undersigned further certifies in support of this motion and pursuant to Local Rule 7.1(d) that she has attempted to obtain Plaintiff's counsel's consent to the relief sought herein, but counsel will not concur in the requested transfer.

WHEREFORE, R.M. Galicia, Inc., a/k/a Progressive Management Systems and prays that this Motion to Transfer Venue be granted, and that, pursuant to, 28 U.S.C. §

1404(a), the above-numbered and captioned matter be transferred to the United States District Court for the Central District of California.

Respectfully submitted,

/s/Deborah A. Lujan
Collins, Einhorn, Farrell & Ulanoff
Deborah A. Lujan (P46990)
Attorney for Defendant, R.M. Galicia, Inc.
4000 Town Center, Ste. 909
Southfield, MI 48075
(248) 355-4141

Attorney for R.M. Galicia, Inc., a/k/a
Progressive Management Systems

CERTIFICATE OF SERVICE

I certify that on April 17, 2012, a copy of the foregoing was filed electronically in the Court's CM/ECF system. Notice of this filing will be sent to the counsel of record by operation of the Court's electronic filing system.

/s/Deborah A. Lujan
Attorney for R.M. Galicia, Inc., a/k/a
Progressive Management Systems

N:\DOCS\PGM010\C112395\MMISC\2937063.DOC